EXHIBIT A

AFFIDAVIT OF ATTORNEY MARCELA ARAUZ QUINTERO

AFFIDAVIT

SUBJECT: REVACK HOLDINGS FOUNDATION Case - The United States of America vs Ramses Owens a/k/a "Ramses Owens Saad" and others.

The undersigned, qualified lawyer in the Republic of Panama, admitted to the Bar by number 6519 as from 25th April 2002, with specialization in Criminal Proceedings, make the following declarations:

- (1)SEIZURE OF FUNDS WITHIN CREDICORP BANK -PANAMA. REVACK HOLDINGS FOUNDATION account and subsidiaries. We have been informed, and we have corroborated that within CREDICORP BANK there have been apprehended all deposited funds of REVACK HOLDINGS FOUNDATION accounts. It has been produced by virtue of an International Assistance, that had been executed and filled in by the Panama SECOND SPECIALIZED PROSECUTION OFFICE FOR THE ORGANIZED CRIME. The same included the seizure of said funds, in order to put them at the orders of United States Attorney Offices. These procedures were done during the March 25 through March 29th week. We requested the Panama prosecutors to provide copies of such Assistance and other related documents pertaining to the Assistance, but copies were prosecutors Panama provided, as the communicated that the compliance is completed without needing to do anything else.
- (2) SEIZURE OF ELECTRONIC DATA FROM RAMSES OWENS MOBILE PHONE SAMSUNG S-8. Dated Tuesday May 7th, 2019, in the afternoon, I received a phone call from the SECOND SPECIALIZED PROSECUTION OFFICE FOR THE ORGANIZED CRIME, in order to make me participate, as a defendant, along with RAMSES OWENS, in the Thursday 9th prosecution activity, at 11:00 o'clock, before the Forensic Information and Technology Section of the Attorney General Institute of Legal Medicine and Forensic Sciences. This legal

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Rosely Yépez

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Res. No. 1218 de 5 de marzo de 2013

Tel.: \$675-2889; ryepez (groyalbusinessgroup.net

diligence was not properly summoned nor notified in written form, but in verbal form by phone. They communicated about a legal International Assistance from the United States, which had been previously authorized by the Panama Circuit Guarantees Judge, as a matter of previous legal control. This audience before the Panama Circuit Guarantees Judge was given without the presence of RAMSES OWENS (owner of the mobile phone data whose information was asked to be seized) nor his defendant council. This mobile device had been apprehended twice by the SECOND SPECIALIZED PROSECUTION OFFICE FOR THE ORGANIZED CRIME, being the first time on the month of May, 2018. The mobile device was given back to RAMSES OWENS on September 2018. All this under the prosecution investigations recorded as No.06-16 (LAVAJATO). This mobile device was again apprehended on Thursday 6th The data seizure prosecution diligence took December 2018. effect with the presence of the SECOND SPECIALIZED PROSECUTION OFFICE FOR THE ORGANIZED CRIME, along with the substitute defendant lawyer, Dr. Yarianis Millan. Mr. RAMSES OWENS, physically appeared before the prosecution diligence as he feared to be arrested if not. As soon as the diligence began, they started to copy all the cellular mobile data into an USB device in order to be couriered to a United States Attorney to the United States. The prosecution office verbally assured the day before that they would certainly handed off copies of the seizure order and minutes, however, the prosecutors denied such copies in such act. This situation of lack of copies was strongly expressed to the prosecution office's assistants, Dr. Marcos Mosquera and Karen Jaen. It was also requested to write down in the Seizure Diligence Minutes about the illegality of such acts, either in the formal word processing text and through handwriting, but it was also denied.

Given this 14th Day of May, 2019,

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MARCELA ARAUZ QUINTERO (qualified criminal attorney at law and admitted to the Bar)

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- 7. by MANAGEMENT DIRECTION
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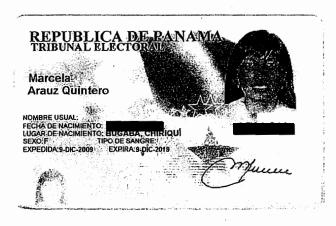
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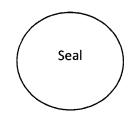
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AFFIDAVIT OF ATTORNEY MARCELA ARAUZ QUINTERO SPANISH VERSION

AFRIDAVIT (Declaración Jurada)
TEMA: CASO REVACK HOLDINGS FOUNDATION - Los Estados
Unidos de América vs Ramses Owens a/k/a "Ramses Owens Saad" y
otros.

La suscrita, abogadas en ejercicio en la República de Panamá, con idoneidad para ejercer desde el 25 de abril de 2002, con No. 6519 y con especialización en Derecho Procesal Penal, hacemos las siguientes declaraciones:

INCAUTACIÓN DE DINEROS EN EL CREDICORP BANK -(1)**HOLDINGS CUENTA** REVACK DE FOUNDATION y subsidiarias. Hemos sido informadas, y hemos corroborado que en el CREDICORP BANK se han aprehendido todos los fondos depositados en las cuentas de REVACK HOLDINGS FOUNDATION. Ello producto de una Asistencia Internacional, que fuera ejecutada o diligenciada por la FISCALÍA SEGUNDA ESPECIALIZADA CONTRA LA DELINCUENCIA ORGANIZADA de Panamá. comprendía la incautación de esos fondos, para a su vez ponerlos a órdenes de fiscales de los Estados Unidos de América. Estos actos fueron ejecutados durante la semana del 25 al 29 de marzo de 2019. Se hizo el requerimiento, a los señores Fiscales de proporcionar copias de la solicitud de Asistencia y demás actos consecuentes de dicha Asistencia, lo cual no se nos proporcionó, ya que manifestaron haber cumplido con la Asistencia respectiva.

(2) INCAUTACIÓN DE DATOS DEL CELULAR SAMSUNG S-8 DE RAMSÉS OWENS. Con fecha martes 7 de mayo de 2019, en horas de la tarde, recibimos llamada de la FISCALÍA SEGUNDA ESPECIALIZADA CONTRA LA DELINCUENCIA ORGANIZADA, para participar en calidad de defensa y al señor RAMSÉS OWENS para el jueves 9 de mayo a las 11:00 am, ante la sección de Informática Forense del Instituto de Medicina Legal y Ciencias Forenses del Ministerio Público de Panamá. Esta diligencia no nos fue notificada por escrito y vía telefónica nos manifestaron correspondía a una Asistencia Internacional de los Estados Unidos de América y una yez

Therew.



recibida, fue requerida su autorización, como control previo ante el Juez de Garantías, y así debidamente autorizado, audiencia ésta que se dio en ausencia de la defensa y del propio titular de los datos que se ordenaron incautar, el señor RAMSÉS OWENS. Este equipo de celular por segunda ocasión está aprehendido por la FISCALÍA SEGUNDA SUPERIOR **DELINCUENCIA CONTRA** LA **ESPECIALIZADA** ORGANIZADA, la primera vez desde el mes de mayo de 2018 y devuelto en septiembre de 2018, dentro de la investigación identificada No.06-16 (LAVAJATO), para nuevamente el jueves 6 de diciembre de 2018, ser aprehendida. La diligencia se dio con la participación del Fiscal Segundo Especializado Contra la delincuencia Organizada, y con la abogadas sustituta del señor la Licenciada RAMSÉS OWENS, Yarianis conjuntamente con RAMSÉS OWENS. El licenciado RAMSES OWENS, compareció a dicha diligencia, por temor de ser detenido, si se negaba a asistir o participar en la misma. Iniciada la misma se hizo una copia de la data del celular a un USB, para que éste sea enviado a un Fiscal en Estados Unidos. Se aseguró que se entregarían copia de la Resolución que ordena la incautación, pero a última hora negó. Esta negativa fue expresada por los asistentes de fiscalía, Licenciados Marcos Mosquera y Karen Jaén. Se solicitó poder escribir en el Acta de incautación, acerca de la ilegalidad del acto, sea en texto formal o a mano, lo cual también fue negado.

Dado en Panamá, a los 14 días de mayo, 2019,

MARCELA ARAUZ QUINTERO

(abogada titulada e idónea)

A SUSCITIENTO (SENTIFICO):

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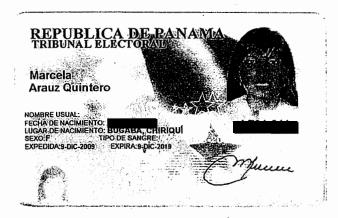


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